

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0889

DIRECT EMAIL shecker@kaplanhecker.com

October 3, 2022

BY ECF

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Neil Cole, 19 Cr. 869 (ER)

Dear Judge Ramos:

We represent Neil Cole in the above-captioned matter. In connection with Mr. Cole's Letter Motion to Request the Issuance of Rule 17(c) Subpoenas and accompanying exhibits, and pursuant to the Protective Order filed in this case (ECF No. 15, ¶ 9), we respectfully request permission to (i) file under seal exhibits C, D, E, and H, and (ii) redact portions of the letter motion that refer to those exhibits.

We are providing to Your Honor's Chambers and to the government copies of this letter, the unredacted letter motion, and all exhibits.

Respectfully submitted,



Sean Hecker